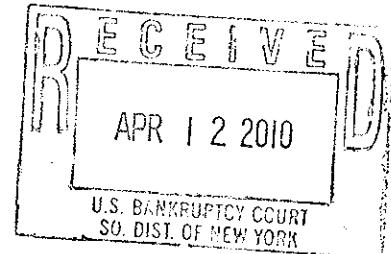


WILLIAM N. LOBEL - State Bar No. 93202
wlobel@thelobelfirm.com
MIKE D. NEUE - State Bar No. 179303
mneue@thelobelfirm.com
THE LOBEL FIRM
840 Newport Center Dr Ste 750
Newport Beach, CA 92660
Telephone: (949) 999-2860
Facsimile: (949) 999-2870



**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : Chapter 11 Case No.
: :
LEHMAN BROTHERS HOLDINGS INC., et al.;: 08-13555 (JMP)
Debtors. : (Jointly Administered)
: :
-----X

**LIMITED JOINDER OF STEVEN M. SPEIER, CHAPTER 11 TRUSTEE IN THE
OPPOSITION OF SUNCAL DEBTORS TO MOTION PURSUANT TO
BANKRUPTCY RULE 9019 FOR AUTHORITY TO COMPROMISE
CONTROVERSY IN CONNECTION WITH A REPURCHASE TRANSACTION
WITH FENWAY CAPITAL, LLC AND A COMMERCIAL PAPER PROGRAM
WITH FENWAY FUNDING, LLC**

I.

JOINDER

Steven M. Speier, as the duly appointed trustee ("Trustee") for the Chapter 11 estates of eight debtor entities operating under the protection of Chapter 11 before the United States Bankruptcy Court Central District of California¹ (the "Trustee Debtors"), hereby submits the following Limited Joinder in the SunCal Debtors' Opposition to the *Motion Pursuant to Bankruptcy Rule 9019 for Authority to Compromise Controversy in*

¹ LB/L-SunCal Oak Valley, LLC, LB/L SunCal Northlake, LLC, SunCal PSV, LLC, Delta Coves Venture, LLC, SunCal Torrance LLC, SunCal Oak Knoll, LLC, SunCal Marblehead, LLC, and SunCal Heartland, LLC.

ORIGINAL

Connection With a Repurchase Transaction With Fenway Capital, LLC and a Commercial Paper Program With Fenway Funding, LLC (the “Compromise Motion”) filed by Lehman Commercial Paper, Inc. (“LCPI”). The Trustee Debtors have no desire to oppose this transaction or to otherwise participate in LCPI’s bankruptcy. However, the Trustee Debtors are concerned that, as a consequence of acquiring the loans as more fully described in the Compromise Motion, LCPI may later assert that the automatic stay in its bankruptcy case applies to certain litigation that the Trustee Debtors and the SunCal Debtors have been pursuing for over a year in the Central District of California.

If LCPI intends to argue that its automatic stay applies to the Central District litigation, which involves approximately \$1 billion in loans that were not previously owned by LCPI, then this should be disclosed to this Court, and the effects and impact on the Trustee Debtors carefully evaluated. Less than thirty days ago, the Bankruptcy Court in California dismissed LCPI as a defendant from the above-mentioned litigation, *at LCPI’s request*, in order to eliminate any conflict with the stay in this proceeding. To the extent that LCPI intends to re-insert itself into the Central District litigation and to invoke its bankruptcy stay, this would be an improper use of the automatic stay.

DATED: April 7, 2010

THE LOBEL FIRM, LLP

By: /s/ William N. Lobel
William N. Lobel, Esq.
Mike D. Neue, Esq.